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Attorneys for Defendants, COUNTY OF SAN BERNARDINO,
ROBERT VACCARI and JAKE ADAMS

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JONATHAN WAYNE BOTTEN, SR.;
TANJA DUDEK-BOTTEN;
ANNABELLE BOTTEN; and J.B., a
minor by and through his guardian
JONATHAN WAYNE BOTTEN, SR.,

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY
OF SAN BERNARDINO; ISAIAH
KEE; MICHAEL BLACWOOD;
BERNARDO RUBALCAVA;
ROBERT VACCARI; JAKE ADAMS;
and DOES 1-10 inclusive,

Defendants.

CASE NO. 5:23-cv-00257-JGB-SHK

Assigned for All Purposes to:
Hon. Kenly Kiya Kato– Courtroom #3

**DECLARATION OF ANITA K.
CLARKE, ESQ. IN SUPPORT OF
COUNTY DEFENDANTS’
OPPOSITION TO PLAINTIFFS’
MOTION TO CONSOLIDATE**

Date: April 4, 2024
Time: 9:30 a.m.
Ctrm: 3

Complaint filed: February 16, 2023

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DECLARATION OF ANITA K. CLARKE

I, Anita K. Clarke, do state and declare as follows:

1. I am an attorney at law duly licensed to practice before this Court and am an associate in the law firm of Lynberg & Watkins, P.C., attorneys of record for Defendants County of San Bernardino, Deputy Vaccari, and Deputy Adams in the above-captioned matter. I have personal knowledge of the facts stated herein, except those stated upon information and belief, and as to those matters, I believe them to be true. If called upon to testify to the matters herein, I could and would competently do so.

2. Attached hereto as Exhibit "A" is a still image from the CHP dash camera footage with notations added to assist the Court. The image is a true and accurate still of the CHP dash camera footage aside from the notations. The notations were made upon information and belief.

3. Attached hereto as Exhibit "B," which upon information and belief, is a true and accurate depiction of the overhead view of the relevant geographical area where the incidents occurred. The yellow circle indicates the Botten residence and the red circle indicates Mr. Puga's vehicle. The notations were made upon information and belief.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this March 14, 2024, at Orange, California.

By: /s/ Anita K. Clarke
ANITA K. CLARKE
Declarant